# Attachment 1 to NOI STORM WATER MANAGEMENT PROGRAM

# FOR NPDES WATERSHED BASED PERMIT NO. NMR04A000

# New Mexico State Fairgrounds EXPO New Mexico NPDES Facility No. NMU001786

**MAY 2015** 

#### **EXECUTIVE SUMMARY**

On December 19, 2014, the EPA issued National Pollutant Discharge Elimination System (NPDES) General Permit Number NMR04A000 (Federal Register, 2014) authorizing discharges from Small MS4s to waters of the United States. It is the position of the EPA that the EXPO New Mexico facilities constitute a regulated small Municipal Separate Storm Sewer System (sMS4) as defined under the Clean Water Act and are therefore subject to the Environmental Protection Agency (EPA) Storm Water Phase II Final Rule. EXPO New Mexico is seeking authorization to discharge storm water under the Middle Rio Grande Watershed Based National Pollutant Discharge Elimination System (NPDES) Separate Storm Water System Permit NMR04A000. This Storm Water Management Plan ("SWMP") is presented for the review and approval of the EPA in support of the EXPO New Mexico's Notice of Intent to Discharge submitted concurrently herewith.

EXPO New Mexico is an MS4 Operator within the Albuquerque Urbanized Area. EXPO New Mexico must meet the following criteria to be eligible for authorization of its storm water discharges under the general permit:

- Determination that its discharges do not cause or have a reasonable potential to cause or contribute to water quality standards not being met in the waters receiving the discharges;
- Determination that its discharges do not exceed any Total Maximum Daly Loads of pollutants established for waters receiving the discharges;
- Determination that its discharges and discharge-related activities do not jeopardize a species listed as endangered or threatened under the Federal Endangered Species Act; and
- Determination that its discharges and discharge-related activities do not affect a property that Is
  listed or is eligible for listing on the National Register of Historic Places as maintained by the U.S.
  Secretary of the Interior.

EXPO New Mexico has determined that it meets the above eligibility requirements.

The Storm Water Management Plan (SWMP) is developed utilizing the following eight (8) EPA Minimum Control Measures (MCMs):

- 1. Construction Site Runoff Control,
- 2. Post-Construction Runoff Control,
- 3. Pollution prevention/Good Housekeeping,
- 4. Industrial and High Risk Runoff
- 5. Illicit Discharge Detection and Elimination,
- 6. Control of Floatables Discharges,
- 7. Public Education and Outreach,
- 8. Public Participation/Involvement,

Annual reports will be submitted to the appropriate authority. In addition, this Storm Water Management Plan (SWMP) delineates Best Management Practices (BMPs), measurable goals, and time frames for implementation steps and activities that will satisfy the requirements for each MCM. BMPs are activities, prohibitions, maintenance procedures and other practices to prevent or reduce the

discharge of pollutants to receiving waters. Upon review and acceptance of these proposed BMPs by the EPA, the BMPs will become incorporated into the permit by reference. EXPO New Mexico will be responsible for implementing the BMPs on the schedule presented. In addition to implementing the BMPs, EXPO New Mexico is responsible for meeting general permit conditions that include:

- Submitting to the EPA a Notice of Intent to authorize MS4 discharges under the permit;
- Compliance with Water Quality Standards;
- Developing and Implementing a Storm Water Management Program;
- Submitting an annual report to the EPA each year;
- Publishing public notices of the Notice of Intent, SWMP, and each annual report;
- Developing a Monitoring and Assessment Plan to measure the effectiveness of BMPs; and
- Maintaining records of all permit-related documents and activities for at least three years from the date of the document or activity or for the term of the permit, whichever is longer.

The Deputy Director of EXPO New Mexico will be responsible for the overall management and implementation of this proposed program.

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#### **ACRONYMS**

AMAFCA Albuquerque Metropolitan Arroyo Flood Control Authority

BMP Best Management Practice

CAFO Concentrated Animal Feeding Operation

CFR Code of Federal Regulations
CGP Construction General Permit

CID New Mexico Construction Industries Division

CIP Capital Improvements Program

CWA Clean Water Act

EH&S Environmental Health & Safety

EPA U.S. Environmental Protection Agency

ESA Endangered Species Act

GIS Geographic Information System

GPS Global Positioning System
HHW Household Hazardous Waste

IDDE Illicit Discharge Detection and Elimination

IPM Integrated Pest Management

LEED Leadership in Energy and Environmental Design

MAP Monitoring & Assessment Plan
MCM Minimum Control Measure
MEP Maximum Extent Practicable
MRF Material Recycling Facility

MS4 Municipal Separate Storm Sewer System

MSGP Multi-Sector General Permit

NHPA National Historic Preservation Act
NMAC New Mexico Administrative Code
NMED New Mexico Environment Department

NMSA New Mexico Statutes Annotated

NOI Notice of Intent

NPDES National Pollutant Discharge Elimination System
OSHA Occupational Health and Safety Administration
RCRA Resource Contamination and Recovery Act

SHPO State Historic Preservation Office
SIC Standard Industrial Classification
SOP Standard Operating Procedure
SWMP Storm Water Management Program
SWPPP Storm Water Pollution Prevention Plan

TMDL Total Maximum Daily Load

USFWS United States Fish and Wildlife Service

UA Urbanized Area

WQS Water Quality Standard

#### INTRODUCTION

#### 1.0 **New Mexico State Fairgrounds - EXPO New Mexico**

The EXPO New Mexico site is a fully developed facility that encompasses 224 acres of exhibition facilities. EXPO New Mexico is responsible for the New Mexico State Fair and operates a year-round service and events facility on the EXPO New Mexico site. In addition, EXPO New Mexico has leased the operation of a race track and casino on approximately 83 acres of the site to the Downs at Albuquerque, Inc.

#### 1.1 **Background & Location**

The EXPO New Mexico site is located within the metropolitan area of Albuquerque, New Mexico (Coordinates: 35.0835, -106.5727). The Environmental Protection Agency (EPA) shows EXPO New Mexico within the hatched urbanized area of Figure 1.

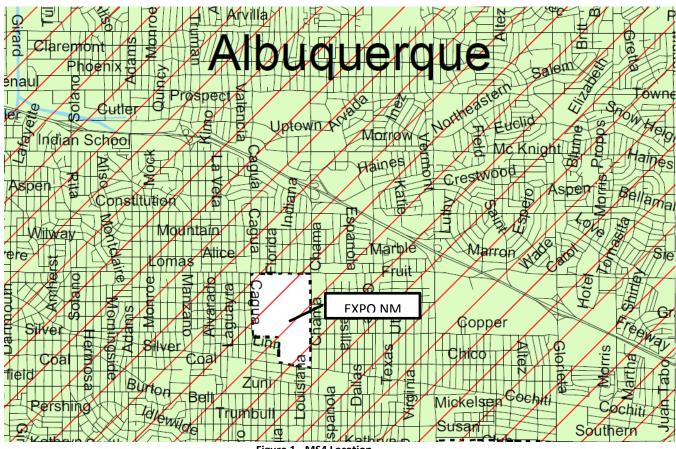


Figure 1 - MS4 Location-

#### 1.2 Land Use

The EXPO New Mexico site is fully developed and includes a variety of uses such as, parking areas, barns, stalls, and horse racing facilities.

#### 2.0 NPDES GENERAL PERMIT FOR DISCHARGES FROM SMALL MS4s

Under the Clean Water Act (CWA), operators of Municipal Separate Storm Sewer Systems (MS4) within an urbanized area are required to obtain permit authorization to discharge storm water. State, city, county and other public bodies in urbanized areas that had fewer than 100,000 residents in the 1990 Decennial Census are called "Small MS4s." Expo New Mexico is a Nontraditional Small MS4 operator.

On December 19, 2014, the EPA issued National Pollutant Discharge Elimination System (NPDES) General Permit Number NMR04A000 (Federal Register, 2014) authorizing discharges from Small MS4s to waters of the United States. Small MS4s are eligible for authorization of their storm water discharges under the General Permit, as long as they comply with the conditions of the permit. The permit requires Small MS4 operators to submit to the EPA a Notice of Intent (NOI) to authorize their storm water discharges under the permit. The sMS4 Operator must also develop, implement and enforce a Storm Water Management Program (SWMP) to reduce the discharge of pollutants to the Maximum Extent Practicable (MEP).

This SWMP was prepared in accordance with Part I.D of the MS4 General Permit by EXPO New Mexico and its consultant, THE Group. EXPO New Mexico will not rely on others for the implementation of the SWMP, but it will combine and/or share efforts with the MS4 operator accepting discharge from EXPO New Mexico for the implementation of the SWMP.

#### PERMIT ELIGIBILITY REQUIREMENTS

#### 3.0 PUBLIC NOTICE AND REVIEW

Part I.A.3.a of the MS4 General Permit requires EXPO New Mexico to provide public notice with the submittal of its NOI. Any issues/comments raised during the public review of this NOI will be summarized and addressed by EXPO New Mexico (Small MS4 Operator) following the public review period and prior to submitting the final NOI to the EPA Region VI. Documentation of the public notice, public comments received, and EXPO New Mexico's response to the comments will be attached into Appendix A.

#### 4.0 NATIONAL HISTORIC PRESERVATION ACT ELIGIBILITY EVALUATION

Part I.A.3.b of the MS4 General Permit requires EXPO New Mexico to assess its compliance with the National Historic Preservation Act (NHPA) in order to be eligible for authorization of its discharges by the permit. EXPO New Mexico is required to assure storm water discharges, non-storm water discharges, and discharge-related activities do not affect property that is listed or is eligible for listing on the National Register of Historic Places. If discharges affect a property protected by the NHPA, a written agreement must be obtained from the State Historic Preservation Office (SHPO) that outlines all measures EXPO New Mexico will undertake to mitigate or prevent adverse effects on the historic property. There are no properties or structures within the boundaries of EXPO New Mexico that are listed in the National Register of Historic Places. However, the Register of Historic Places information received from the New Mexico Historic Preservation Office contains eight listed historic structures within EXPO New Mexico's portion of the Albuquerque Urbanized Area. The structures are:

- Bldg. #105 Fine Arts Gallery
- Bldg. #404 Beef Cattle Barns
- Bldg. #502 Horse Barns
- Bldg. #702 Race Horse Barns
- Bldg. #703 Race Horse Barns
- Bldg. #707 Race Horse Barns
- Bldg. #102 Gate #4 Entrance
- Bldg. #307 Jockey Rooms

EXPO New Mexico evaluated its permit eligibility in relation to the NHPA using the criteria in Appendix B of the MS4 General Permit. The evaluation and documentation of coordination with the New Mexico Historic Preservation Division are attached in Appendix C.

EXPO New Mexico determined the site is eligible for general permit authorization of its MS4 discharges under Part I.A.3.b NHPA Criterion A of the permit. No historic properties are identified in the path of an MS4's storm. Historic structures are identified within EXPO New Mexico, but they will not be affected by the discharges or construction of BMPs to control any discharge.

#### 5.0 WATER QUALITY STANDARDS

Part I.C.1 of the MS4 General Permit prohibits authorization of discharges that will cause or have the reasonable potential to cause or contribute to the excursion above any applicable Water Quality Standard (WQS), unless appropriate controls and procedures are implemented to bring the discharge into compliance with the standards.

As shown on the facility map for the EXPO New Mexico sMS4 attached in Appendix B, the sMS4 discharges storm water drainage from the limit of the sMS4 into a City of Albuquerque storm drain at San Pedro Blvd. continuing to Embudo Arroyo, which flows into the Rio Grande. Embudo Arroyo is a non-classified stream; therefore, it has no designated uses but has a numeric water quality standards equivalent to the requirements of discharges to the Rio Grande.

#### 6.0 TOTAL MAXIMUM DAILY LOADS

Part I.C.2 of the MS4 General Permit prohibits authorization of discharges that are inconsistent with a Total Maximum Daily Load (TMDL) for impaired surface water, unless the SWMP includes measures or controls that are consistent with the assumptions and requirements of the TMDL. EXPO New Mexico is located in the southeast quadrant of the City of Albuquerque, New Mexico. Drainage from the site enters the City of Albuquerque's storm sewer system. All storm water from the site eventually flows into the Rio Grande River (approx. 4 miles west of EXPO New Mexico).

Section 303(d) of the Federal Clean Water Act required states to develop TMDL management plans for water bodies determined to be water quality limited. The New Mexico Environment Department Surface Water Quality Bureau has developed a TMDL for the portion of the Rio Grande where storm water from the EXPO New Mexico's sMS4 ultimately discharges to (middle Rio Grande). A bacteria TMDL for the Middle Rio Grande was approved by the New Mexico Water Quality Control Commission on April

13, 2010, and by EPA on June 30, 2010. Appendix B of the MS4 General Permit has established the TMDL Waste Load Allocation (WLA) for stream segment 2105\_50. The fecal coliform TMDL (WLA) will be proportional to the area of the MS4 in relation to the total WLA of the permit area. A fecal coliform TMDL Waste Load Allocation has been established in accordance with Appendix B, Table in B.2 (*E. coli* loading on a per area basis) for the 223 acres of the EXPO New Mexico sMS4. The results listed below will designate the WLA for sMS4.

	High	Moist	Mid	Dry	Low
E. coli (cfu/ day)	6.23E+08	1.56E+08	1.05E+08	3.86E+07	8.98E+06

Table 1 - Waste Load Allocation

EXPO New Mexico will determine that its storm water discharges are in compliance and eligible for coverage under the general permit in compliance with the monitoring requirements. Existing facilities and this SWMP include measures and controls that are consistent with the assumptions and requirements of the TMDL

#### 7.0 ENDANGERED SPECIES ACT ELIGIBILITY EVALUATION

Consistent with the conditions Part I.C.3 of the MS4 General Storm Water Permit, the impacts of storm water discharge-related activities on federally listed endangered and threatened species, and designated critical habitat must be assessed. The U.S. Fish and Wildlife Service's list of federal endangered and threatened species of concern for Bernalillo County, New Mexico includes five species. These species include the following:

- Southwestern Willow Flycatcher
- Bald Eagle
- Mexican Spotted Owl
- Black-footed Ferret
- Rio Grande Silvery Minnow

According to U.S. Fish & Wildlife Service, Southwestern Region Ecological Services (2014), endangered species are not known to occur on the site nor is there any documented critical habitat areas within the site for these species. No habitat or presence of the Rio Grande Silvery Minnow occurs on the EXPO New Mexico sMS4 boundary. This species only occurs within the Rio Grande which is not present within the boundaries of EXPO New Mexico and is approximately 4 miles west of the EXPO New Mexico sMS4 permitted area. The Bald Eagle and the Mexican Spotted Owl may migrate through the area at certain times of the year, however, these species are not known to utilize the site for any extended periods of time and no documented critical habitat areas exist within the site. The Southwestern Willow Flycatcher and the Black-footed Ferret are not known to occur on the site nor is there any documented critical habitat areas within the site for these species.

EXPO New Mexico meets the Endangered Species Act (ESA) Eligibility Provisions of the MS4 permit under <u>Criterion A:</u> no endangered or threatened species or critical habitat occur in the proximity to the MS4 or points where authorized discharges reach waters of the United States.

#### 7.1 Dissolved Oxygen Program

EXPO New Mexico has identified and investigated structural elements or oxygen demanding pollutants within its jurisdiction that may be contributing to reduced dissolved oxygen in the receiving water of the Rio Grande.

ВМР	Description		
6.01 – Eliminate discharge of pollutants	EXPO New Mexi	co will implement controls	to identify and eliminate
that contribute to exceedances of water	the contributing pollutants.		
quality standards			
Measurable Goal		Permit Reference	Expected Implementation
Submit summary of findings and ac	tivities.	Part I.C.3.a.(i)	Year 1

#### 7.2 Sediment Pollutant Load Reduction Strategy

EXPO New Mexico has identified and investigated areas within its jurisdiction that may be contributing excessive levels of pollutants in sediments to the receiving waters of the Rio Grande as a result of stormwater discharges. EXPO New Mexico has identified structural elements, MS4 operations, activities, and areas that will reduce sediments pollutants in the receiving waters of the Rio Grande.

ВМР	Description			
6.02 - Sediment Assessment	EXPO New N	Mexico will identify and inv	estigate areas within its	
	jurisdiction	that may be contributing e	excessive levels of pollutants in	
	sediments.	,	·	
Measurable Goal	•	Permit Reference	Expected Implementation	
Submit summary of findings and a	ctivities.	Part I.C.3.b.(i)	Year 1	
ВМР	Description			
6.03 – Eliminate discharge of pollutants	EXPO New N	EXPO New Mexico will implement controls to eliminate the		
that contribute to exceedances of water	contributing pollutants.			
quality standards		•		
Measurable Goal		Permit Reference	Expected Implementation	
Submit summary of findings and a	ctivities.	Part I.C.3.b	Year 1	
ВМР	Description			
6.04 – Eliminate discharge of pollutants	EXPO New N	Mexico will implement con	trols to eliminate the	
		pollutants.		
quality standards				
Measurable Goal		Permit Reference	Expected Implementation	
Submit summary of findings and a	ctivities.	Part I.C.3.b	Year 1	

#### STORM WATER MANAGEMENT PROGRAM

#### 8.0 GENERAL REQUIREMENTS

EXPO New Mexico will comply, to the maximum extent feasible, with all of the permit conditions set forth in the General Permit, including specifically the Standard Permit Conditions set forth in Part 6 of the General Permit. Where appropriate, cross-references to the General Permit are provided in this SWMP. EXPO New Mexico has developed and will enforce this Stormwater Management Program (SWMP) to reduce the discharge of pollutants from the MS4 to the maximum extent practicable (MEP), to protect water quality, and to satisfy applicable surface water quality standards.

#### 9.0 LEGAL AUTHORITY

EXPO New Mexico has complete policy, development and operational control of the MS4. EXPO New Mexico has developed control that will control the contribution of pollutants to the MS4 by stormwater discharges.

#### 10.0 MEASURABLE GOALS

EXPO New Mexico will implement the provisions set forth in Part I.D.5 of the permit, and has incorporated into the SWMP the control measures listed below. The SWMPs includes measurable goals, interim milestones, for each control measure, and as appropriate, the months and years in which the MS4 will undertake the required actions and the frequency of the action.

#### 11.0 MINIMUM CONTROL MEASURES

The MS4 General Permit (GP) outlines eight Minimum Control Measures (MCMs) for the SWMP:

- Construction Site Storm Water Runoff Control
- Post-Construction Storm Water Management in New Development and Redevelopment
- Pollution Prevention/Good Housekeeping for Municipal Operations
- Industrial and High Risk Runoff
- Illicit Discharges and Improper Disposal
- Control of Floatables Discharges
- Public Education and Outreach on Storm Water Impacts
- Public Involvement/Participation

A MCM consists of Best Management Practices (BMPs) to prevent or reduce the discharge of pollutants. According to the Code of Federal Regulations, Part 40, Section 122.34, implementation of the BMPs consistent with an authorized SWMP constitutes compliance with the Maximum Extent Practicable (MEP) standard for a sMS4. The following were considered in selecting BMPs for each MCM:

- Existing resources and activities that could be utilized to protect storm water quality;
- Size of the population impacted; and
- Type of water bodies receiving discharges from the MS4.

This Storm Water Management Program (SWMP) delineates Best Management Practices (BMPs) and implementation steps and activities that will satisfy the requirements for each MCM. The implementation period is proposed to be five (5) years or less, the same as the permit term limit. Annual reports will be submitted to the appropriate authorities.

#### 11.1 CONSTRUCTION SITE STORM WATER RUNOFF CONTROLS

The sMS4 is a fully developed facility within the urban area of Albuquerque; Redevelopment projects at EXPO New Mexico are constructed by companies under contract requirements of EXPO New Mexico. As a state facility, construction at EXPO New Mexico is governed by the New Mexico Construction Industries Division (CID) rules as published in the NMAC. Construction contracts require the contractor to comply with the Construction General Permit (CGP), including preparation of a Storm Water Pollution Prevention Plan (SWPPP). The contractor is required to submit the SWPPP to EXPO New Mexico for review.

ВМР	Description		
6.11 - Develop policies to reduce	EXPO New Mexico will publish policies governing construction		
sediments in any stormwater runoff to	activities.		
the MS4 from construction activities.			
Measurable Goal		Permit Reference	Expected Implementation
Review and publication of construc	tion policies.	Part I.D.5.a.(ii).(a) -	Month 10
		Part I.D.5.a.(ii).(c)	
ВМР	Description		
6.12 - Develop procedures for site plan	EXPO New Mexi	co will develop review prod	cedures for all new
review of construction activities	construction. The	ne procedures will include:	site design, planned
	operations durin	ng construction, control me	asures and post
	development ru	noff control.	
Measurable Goal		Permit Reference	Expected Implementation
Publish review procedures.		Part I.D.5.a.(ii).(d)	Month 10
ВМР	Description		
6.13 – Solicit Public Input on Construction	Solicit public inp	ut on construction Issues a	nd activities.
Controls			
Measurable Goal		Permit Reference	Expected Implementation
Number of comments received.		Part I.D.5.a.(ii).(e)	Month 10
ВМР	Description		
6.14 - Conduct site inspections of 100	EXPO New Mexi	co will conduct a review of	all new construction
percent of all construction project-Storm	projects for pote	ential NPDES CGP requirem	ents and maintain an
Water Construction General Permit	inventory of all a	active permitted and previo	ously closed construction
(CGP), Compliance and Enforcement	sites.		
Measurable Goal		Permit Reference	Expected Implementation
Review new construction projects a	is required.	Parts I.D.5.a.(ii).(f)	Month 10
		I.D.5.a.(iii)	
ВМР	Description		
6.15 – Education and training Compliance	Develop educati	on program for facility pers	sonnel on review and
and Enforcement	inspection of co	nstruction. Training of con	tractors and supporting
	personnel on th	e requirements of SWPPP f	or construction sites.
Measurable Goal		Permit Reference	Expected Implementation
Publish review procedures.		Part I.D.5.a.(ii).(g)	Month 10

BMP	Description		
6.16 - National Pollutant Discharge		ico will conduct a review of	all projects for potential
Elimination System (NPDES) – Storm		uirements and maintain an	
Water Construction General Permit	permitted and previously closed construction sites.		
(CGP), Compliance and Enforcement	P		
Measurable Goal		Permit Reference	Expected Implementation
Complete record of reviews, inspec	ctions reports	Part I.D.5.a.(ii).(h)	Month 10
and enforcement actions included			
reporting.	iii aiiiiaai		
ВМР	Description		_
6.17- Planning and permitting.	EXPO New Mex	ico has complete control ov	er policies for
	development w	ithin its jurisdiction and wil	l ensure that construction
	stormwater cor	ntrols eliminate erosion and	maintain sediment on
	site		
Measurable Goal		Permit Reference	Expected Implementation
Implement, evaluate and revise po	licies regarding	Part I.D.5.a.(iv)	Month 10
erosion control.			
BMP	Description		
6.18- Evaluate existing and potential	•	ehensive policy controlling	migration of sediment and
enhanced erosion control policies for		from construction sites, ar	_
disturbed land areas.		s graded sites remain unim	_
	stabilization occurs.		
Measurable Goal	L	Permit Reference	Expected Implementation
Reporting of number of plans that	did or did not	Part I.D.5.a.(v)	Month 10
incorporated GI/LID practices		, ,	
I		I .	1

#### 11.2 POST-CONSTRUCTION STORM WATER MANAGEMENT

The sMS4 is a fully developed facility within the urban area of Albuquerque; Redevelopment projects at EXPO New Mexico are constructed by companies under contract requirements of EXPO New Mexico. Redevelopment strategies of the facilities will include a combination of structural and non-structural (BMPs) to control pollutants in stormwater runoff.

ВМР	Description		
6.21 – Post-Construction standards and	Review existing construction standards and details regarding storm		
details regarding storm water quality	water quality and evaluate promulgation of details for use in site		
		vithin the sMS4 boundary.	
Measurable Goal		Permit Reference	Expected Implementation
Evaluate design details and update	as necessary.	Part I.D.5.b.(i)	Month 10
		Part I.D.5.b.(ii).(a)	
BMP	Description		
6.22 - LEED Silver Standards for	•	y that all new improvemer	nt projects will be built to
Development		Green Building Council's L	
		ding maintenance of Gree	
	Impact Develop	=	
Measurable Goal	pace Bevelop	Permit Reference	Expected Implementation
Storm Water Design requirements	are to limit	Part I.D.5.b.(ii).(b)	Month 30
disruption of natural hydrology by			
impervious cover, increase on-site			
reduce or eliminate pollution from			
runoff, and limit the disruption of n			
flows.	acarar water		
	T		I
BMP	Description		
	Marithan Daning	D !	d a d a
6.23 – Drainage Design Guidelines	_	e Design Guidelines for ne	w development and
	Written Drainag redevelopment	projects.	
Measurable Goal	redevelopment	projects.  Permit Reference	Expected Implementation
Measurable Goal  Develop written Drainage Design G	redevelopment uidelines for	projects.	
Measurable Goal  Develop written Drainage Design G  new development and redevelopm	redevelopment uidelines for ent projects.	projects.  Permit Reference	Expected Implementation
Measurable Goal  Develop written Drainage Design G  new development and redevelopm  The guidelines will encourage minir	redevelopment uidelines for ent projects. mization of	projects.  Permit Reference	Expected Implementation
Measurable Goal  Develop written Drainage Design G  new development and redevelopm  The guidelines will encourage mining impervious area, preservation of national series of the series	redevelopment uidelines for ent projects. mization of atural drainage	projects.  Permit Reference	Expected Implementation
Measurable Goal  Develop written Drainage Design G  new development and redevelopm  The guidelines will encourage minin impervious area, preservation of no	redevelopment uidelines for ent projects. mization of atural drainage lesign features	projects.  Permit Reference	Expected Implementation
Measurable Goal  Develop written Drainage Design G  new development and redevelopm  The guidelines will encourage mining impervious area, preservation of national series of the series	redevelopment uidelines for ent projects. mization of atural drainage lesign features	projects.  Permit Reference	Expected Implementation
Measurable Goal  Develop written Drainage Design G  new development and redevelopm  The guidelines will encourage minin impervious area, preservation of no	redevelopment uidelines for ent projects. mization of atural drainage lesign features	projects.  Permit Reference	Expected Implementation
Measurable Goal  Develop written Drainage Design G  new development and redevelopm  The guidelines will encourage minin impervious area, preservation of no systems, and the incorporation of of to protect or improve storm water	redevelopment uidelines for ent projects. mization of atural drainage lesign features quality  Description EXPO New Mexi	projects.  Permit Reference Part I.D.5.b.(ii).(c)  co has complete control o	Expected Implementation Year 1  ver policies for
Measurable Goal  Develop written Drainage Design G  new development and redevelopm  The guidelines will encourage minin impervious area, preservation of no systems, and the incorporation of of to protect or improve storm water	redevelopment uidelines for ent projects. mization of atural drainage lesign features quality  Description EXPO New Mexi	projects.  Permit Reference Part I.D.5.b.(ii).(c)	Expected Implementation Year 1  ver policies for
Measurable Goal  Develop written Drainage Design G  new development and redevelopm  The guidelines will encourage minin impervious area, preservation of no systems, and the incorporation of of to protect or improve storm water	redevelopment uidelines for ent projects. mization of atural drainage design features quality  Description EXPO New Mexi development wi	projects.  Permit Reference Part I.D.5.b.(ii).(c)  co has complete control o	Expected Implementation Year 1  ver policies for Il ensure that post-
Measurable Goal  Develop written Drainage Design G  new development and redevelopm  The guidelines will encourage minin impervious area, preservation of no systems, and the incorporation of or to protect or improve storm water  BMP  6.24- Program review - Policy review.  Measurable Goal	redevelopment uidelines for ent projects. mization of atural drainage design features quality  Description EXPO New Mexi development wi construction sto	Permit Reference Part I.D.5.b.(ii).(c)  co has complete control of thin its jurisdiction and wi	Expected Implementation Year 1  ver policies for Il ensure that post-
Measurable Goal  Develop written Drainage Design G  new development and redevelopm  The guidelines will encourage minin impervious area, preservation of no systems, and the incorporation of of to protect or improve storm water  BMP 6.24- Program review - Policy review.  Measurable Goal Implement, evaluate and revise policy	redevelopment uidelines for ent projects. mization of atural drainage design features quality  Description EXPO New Mexi development wi construction sto	projects.  Permit Reference Part I.D.5.b.(ii).(c)  co has complete control of ithin its jurisdiction and with its immediate controls are installed in the permit Reference Part I.D.5.b.(ii).(d) -	Expected Implementation Year 1  ver policies for Il ensure that post- alled and maintained.
Measurable Goal  Develop written Drainage Design G  new development and redevelopm  The guidelines will encourage minin impervious area, preservation of no systems, and the incorporation of or to protect or improve storm water  BMP  6.24- Program review - Policy review.  Measurable Goal	redevelopment uidelines for ent projects. mization of atural drainage design features quality  Description EXPO New Mexi development wi construction sto	projects.  Permit Reference Part I.D.5.b.(ii).(c)  co has complete control of ithin its jurisdiction and with its jurisdiction and with its properties of the permit Reference Part I.D.5.b.(ii).(d) - Part I.D.5.b.(ii).(h)	ver policies for ll ensure that post-alled and maintained.
Measurable Goal  Develop written Drainage Design G  new development and redevelopm  The guidelines will encourage minin impervious area, preservation of no systems, and the incorporation of of to protect or improve storm water  BMP 6.24- Program review - Policy review.  Measurable Goal Implement, evaluate and revise policy	redevelopment uidelines for ent projects. mization of atural drainage design features quality  Description EXPO New Mexi development wi construction sto	projects.  Permit Reference Part I.D.5.b.(ii).(c)  co has complete control of ithin its jurisdiction and with its immediate controls are installed in the permit Reference Part I.D.5.b.(ii).(d) -	Expected Implementation Year 1  ver policies for Il ensure that post- alled and maintained.  Expected Implementation

#### 11.3 POLLUTION PREVENTION GOOD HOUSEKEEPING FOR PERMITTEE OPERATIONS

Many of the program elements enumerated in the permit are not applicable to this non-traditional sMS4. However, EXPO New Mexico recognizes the need for continuous evaluation of performance of storm water pollution prevention good housekeeping.

ВМР	Description			
6.31 - Operation and Maintenance	Evaluate, develo	p and implement enhance	d Operation and	
Program to Reduce Pollutants Maintenance p		ogram		
Measurable Goal		Permit Reference	Expected Implementation	
Develop and implement an operation	on and	Part I.D.5.c.(i).	Year 1	
maintenance program that includes	s a training			
component and has the ultimate go	oal of preventing			
or reducing pollutant runoff				
ВМР	Description			
6.31 – Disposition of waste material	Develop disposa	I procedures for the variou	s waste materials	
recovered from flood control facilities		facilities during routine and		
		_	ical materials removed from facilities include	
		bles, and debris.		
Measurable Goal	•	Permit Reference	Expected Implementation	
Develop and implement standard o	perating	Part I.D.5.c.(ii).(a) –	Year 1	
procedure for disposal of waste ma	terial recovered	Part I.D.5.c.(ii).(I)		
from flood control facilities.				
ВМР	Description			
6.32 – Review facilities operations	Review facilities	operations and impacts, a	nd draft policies as	
	appropriate		•	
Measurable Goal		Permit Reference	Expected Implementation	
Evaluate impact determination for	facilities	Part I.D.5.c.(ii).(m) –	Year 1	
operations, and document and imp	lement changes	Part I.D.5.c.(ii).(n)		
identified for operations				

#### 11.4 INDUSTRIAL AND HIGH RISK RUNOFF

BMP

6.41 – Runoff Monitoring

The MS4 is fully developed with no industrial runoff. However, on 45 acres of the facility EXPO New Mexico provides for the intermittent stabling of exhibitor animals. The animal population has been determined to be in excess of the threshold for a large Concentrated Animal Feeding Operation (CAFO). The permitting authority has designated the facility as a significant contributor of pollutants; therefore, it is required to obtain permit authorization as a large CAFO. On July 16, 2016, coverage under the NPDES General Permit for Discharges from CAFOs in New Mexico (NMG010000) was authorized for the facility.

#### 11.4.1 Concentrated Animal Feeding Operations

EXPO New Mexico is interested in reducing pollutants in storm water from the animal containment stalls and facilities. EXPO New Mexico has prepared the "Plan for the Elimination of CAFO Waste Discharge to Municipal Storm Drain by EXPO NEW MEXICO – CWA-06-2012-1807" for elimination of contaminants from these facilities. The controls are both structural and non-structural (operational procedures). EXPO New Mexico has constructed significant control facilities to ensure the containment of pollutants on site. EXPO New Mexico has prepared and implemented policies to ensure continued compliance. The BMP's implemented as part of this SWMP are in addition to the policies and practices of the Certified Nutrient Management Plan (CNMP) attached to the NOI for coverage under NPDES General Permit for Discharges from CAFOs in New Mexico (NMG010000).

Conduct weekly visual inspections of all storm water diversion

Description

	7		
	devices, runoff	diversion structures, an	d devices channeling
	contaminated st	contaminated sto rm water to the wastewater and manure storage	
	and containmer	t structures.	
Measurable Goal		Permit Reference	Expected Implementation
In the event of any overflow or other	er discharge of	Part I.D.5.c.(iii)	Year 1
pollutants from a wastewater stora	ge or retention	Part I.D.5.d	
structure. Options for upgrade, ma	intenance, or		
repair will be identified, necessary	funding will be		
allocated, and a schedule for upgra	de,		
modification, and/or elimination w	ill be identified.		
ВМР	Description		
6.42 – Animal Waste Collection / Disposal	Provide for the	the scheduled monitoring, collection and removal of	
	animal waste at	appropriate locations.	
Measurable Goal		Permit Reference	Expected Implementation
In the event of any overflow or other	er discharge of	Part I.D.5.d	Year 1
pollutants from a manure storage s	tructure.		
Options for upgrade, maintenance,	or repair of		
facilities will be identified to prever	nt discharge, and		
a schedule for upgrade, modification, and/or		1	
a schedule for upgrade, modification	n, and/or		

#### 11.5 ILLICIT DISCHARGES AND IMPROPER DISPOSAL

An illicit discharge is any discharge to EXPO New Mexico's sMS4 that is not composed entirely of storm water; except for discharges authorized to or from by the General Permit or another NPDES permit.

Description					
Storm sewer and	d drainage systems map v	vill be developed and will be			
maintained.					
Measurable Goal		Expected Implementation			
maps will be	Part I.D.5.e.(i).(a)	Month 10			
nintained on an					
Description					
	orm water discharge loca	tions will be conducted to			
	•				
•	water discharges to the storm sewer system.				
	Permit Reference	Expected Implementation			
a minimum of	Part I.D.5.e.(ii)	Month 10			
rm water					
•					
Description					
If illicit connection	on is identified, investigate and document source and				
	=				
	Permit Reference	Expected Implementation			
ry weather	Part I.D.5.e.(iii)	Month 10			
al discharges.					
Options for upgrade, maintenance, or repair of illicit or inappropriate discharges will be identified, necessary funding will be allocated, and a schedule					
	Description Inspections of st identify and inventors water  Description Inspections of st identify and inventors water  Description If illicit connections appropriateness  ry weather al discharges. or repair of ill be identified,	Storm sewer and drainage systems map we maintained.  Permit Reference Part I.D.5.e.(i).(a)  Description Inspections of storm water discharge local identify and investigate any illicit, inapproduce a minimum of mater and mater and mater and mater and material discharges of discharge and halt (if a permit Reference part I.D.5.e.(iii)  Permit Reference Part I.D.5.e.(iii)  Permit Reference Part I.D.5.e.(iii)  Permit Reference Part I.D.5.e.(iiii)			

#### 11.6 **CONTROL OF FLOATABLES DISCHARGES**

EXPO New Mexico will implement a floatables control program that shall include source controls and, where necessary, structural controls.

ВМР	Description		
<b>6.61 - Develop, update, and implement a</b> Evaluate, deve		op and implement enhanced Operation and	
program to address and control	Maintenance pr	ogram	
floatables in discharges into the MS4			
Measurable Goal	•	Permit Reference	Expected Implementation
Develop and implement an operation	on and	Part I.D.5.f.(i).(a)	Year 1
maintenance program that includes	s a training	Part I.D.5.f.(ii)	
component and has the ultimate go	oal of preventing		
or reducing floatables in stormwate	er runoff		
ВМР	Description		
6.62 - Estimate the annual volume of	Evaluate, develo	p and implement enhan	ced Operation and
floatables and trash removed from each	Maintenance pr	ogram	
control facility			
Measurable Goal  Estimate the annual volume of floatables and trash		Permit Reference	Expected Implementation
		Part I.D.5.f.(i).(b)	Year 1
removed from each control facility	and characterize	Part I.D.5.f.(iii)	
the floatable type			

#### 11.7 PUBLIC EDUCATION AND OUTREACH ON STORM WATER IMPACTS

EXPO New Mexico believes public education is fundamental to addressing storm water pollution and therefore will implement the following practices. All activities related to public education and outreach will be documented in the annual reports. EXPO New Mexico has no resident population. Therefore, EXPO New Mexico is a non-traditional sMS4 as described in General Permit Part VII. The target audiences for its public education and outreach are:

- Management and Staff;
- Tenants in leased facilities; and
- Visitors to events held on the site.

The EXPO New Mexico grounds maintenance staff inspects the facility for pollutants each week. The most common pollutants found are trash. Public education and outreach activities for staff, tenants and visitors will be primarily targeted at these pollutants.

ВМР	Description		
6.71 – Partnering with Exhibitors and	EXPO New Mexico will participate in public education partnering		
Users	activities pertaining to storm water quality.		
Measurable Goal		Permit Reference Ex	
Compliance personnel will participate in at least		Part I.D.5.g.(i)	Year 1
one event per year.		Part I.D.5.g.(ii).(a)	
ВМР	Description		
	•		
6.72 – Display of Educational Materials	Develop and dis	tribute educational materia	al concerning impacts of
6.72 – Display of Educational Materials for Staff and Visitors	•	tribute educational materia charge to watersheds.	al concerning impacts of
	•		el concerning impacts of  Expected Implementation
for Staff and Visitors	storm water dis	charge to watersheds.	

ВМР	Description		
6.73 – Conduct outreach activities about	An area-specific	public education program focusing on increasing the	
the impacts of storm water discharges	public's understanding of storm water issues will be developed and		es will be developed and
	presented.		
Measurable Goal		Permit Reference	Expected Implementation
A review of existing educational ma	A review of existing educational materials is		Year 1
proposed at the time permit covera	ige begins. This	Part I.D.5.g.(ii).(f)	
review will evaluate the materials, potentially identifying the need to improve/augment as			
necessary to focus attention on primary pollutants			
of concern.			
ВМР	Description		
6.74 – Exhibition Pollution Prevention Provide notices		s promoting storm water awareness and protection.	
Measurable Goal	•	Permit Reference	Expected Implementation
Review its facility use agreements a	Review its facility use agreements and identify a		Year 1
means to include pollution prevention educational			

ВМР	Description		
6.75 – Inlet Markers	Mark inlets with pollution prevention messages.		
Measurable Goal Permit Reference Expected Implement		Expected Implementation	
Have all inlets within the facility marked.		Part I.D.5.g.(ii)	Year 2

#### 11.8 PUBLIC INVOLVEMENT and PARTICIPATION

material and requirements in the agreements.

Employees and staff of EXPO New Mexico will be targeted for involvement in the SWMP through the BMPs and Pollution Prevention Good Housekeeping for Operations. The Public Involvement, Participation MCM will focus on involving staff, tenants, exhibitors and visitors in pollution prevention.

ВМР	Description		
6.81 – Solicit Public Input on Storm Water	Solicit public input on storm water related Issues and activities.		
Related Issues and Activities			
Measurable Goal		Permit Reference	Expected Implementation
Number of comments received.		Part I.D.5.h.(i)	Year 1
ВМР	Description		
6.82 – Exhibition and Display of	Provide for exhibitions on storm water related Issues and activities.		ited Issues and activities.
<b>Educational Materials</b>			
Measurable Goal		Permit Reference	Expected Implementation
Number of comments received.		Part I.D.5.h.(ii)	Year 1
ВМР	Description		
6.83 – Use materials or outreach	Use of stormwater educational materials provided by the State,		rovided by the State,
programs directed toward targeted	Tribe, EPA, environmental, public interest or trade organizations, or		
groups	other MS4s.		
Measurable Goal	•	Permit Reference	Expected Implementation
Develop (or update), implement, ar	nd maintain a	Part I.D.5.h.(iii)	Year 1
public involvement and participation	n plan		

#### 12.0 REVIEWING AND UPDATING THE SWMP

The MS4 General Permit requires EXPO New Mexico to annually review its SWMP in conjunction with preparation of the annual report. EXPO New Mexico may add BMPs, components, controls, or requirements to the SWMP at any time upon written notification to the EPA, as long the changes do not replace anything in the SWMP and nothing is removed from the SWMP. If EXPO New Mexico wishes to replace an ineffective or infeasible BMP with an alternate BMP, EXPO New Mexico must submit a written request for the change to the EPA. Requests for changes must include:

- An analysis of why the BMP is ineffective or infeasible (including cost prohibitive);
- Expectations of the effectiveness of the replacement BMP;
- An analysis of why the replacement BMP is expected to achieve the goals of the BMP being replaced.

Unless denied by the EPA, changes proposed according to the criteria above will be deemed approved and may be implemented sixty (60) days after submitting the request. Refer to Part 5.5 of the MS4 General Permit for all requirements related to Reviewing and Updating SWMPs.

#### 13.0 RECORDKEEPING

EXPO New Mexico will retain (as applicable) for at least three years from the date of the sample, measurement, report, or permit application, or for the remainder of the permit term, whichever is longer the following:

- Records of all data used to complete the NOI;
- Copies of all reports required by the permit;
- Copies of Discharge Monitoring Reports (DMRs);
- A copy of the NPDES permit;

#### 14.0 MONITORING, ASSESSMENT, AND REPORTING REQUIREMENTS

The MS4 General Permit requires EXPO New Mexico to develop a Monitoring /Assessment Plan (MAP) that evaluates program compliance, the appropriateness of best management practices, and progress toward achieving the SWMPs measurable goals. EXPO New Mexico will submit the MAP to the EPA as required and with the annual report. The MAP will seek to measure the improvement and or protection of water quality that is resulting from implementation of the SWMP. Examples of measures that are included in the MAP are:

- Quantity of material removed from the MS4;
- Number of illicit discharges found and eliminated;
- Number of construction sites in compliance with the CGP; and
- Number of new projects using LEED principles to protect or improve water quality.

#### 14.1 MONITORING AND ASSESSMENT

EXPO New Mexico will develop, in consultation with NMED and EPA, and implement a comprehensive monitoring and assessment program designed to meet the following objectives:

- Assess compliance with this permit;
- Assess the effectiveness of the stormwater management program;
- Assess the impacts to receiving waters resulting from stormwater discharges;
- Characterize stormwater discharges;
- Identify sources of elevated pollutant loads and specific pollutants;
- Detect and eliminate illicit discharges and illegal connections to the MS4; and
- Assess the overall health and evaluate long-term trends in receiving water quality.

EXPO New Mexico has selected specific monitoring locations, as depicted in Appendix B, sufficient to assess effects of storm water discharges on receiving waters. The monitoring will be at a location coming into the MS4 jurisdictional area (upstream) and leaving the MS4 jurisdictional area (downstream). Monitoring will include TSS, TDS, COD, BOD5, DO, oil and grease, E.coli, pH, total kjeldahl nitrogen, nitrate plus nitrite, dissolved phosphorus, total ammonia plus organic nitrogen, total phosphorus, PCBs and gross alpha.

ВМР	Description		
9.01 – Submit wet weather monitoring	Select specific monitoring locations sufficient to assess effects of		
preference to EPA	storm water discharges on receiving waters		
Measurable Goal	Permit Reference Expected Imple		Expected Implementation
Required locations identified and basslines		Part III.A	Year 1
established.			

#### 14.1.1 Wet Weather Monitoring

Perform wet weather monitoring when the predicted (or actual) rainfall magnitude of a storm event is greater than 0.25 inches and an antecedent dry period of at least forty-eight (48) hours after a rain event greater than 0.1 inch in magnitude is satisfied. EXPO New Mexico will comply with schedules in Part III.1 Table 10, and the results of the Wet Weather Monitoring will be provided in each annual report.

ВМР	Description		
9.11 – Perform wet weather monitoring	Conduct wet weather monitoring to gather information on the		
	response of receiving waters to wet weather discharges from the		
	MS4		
Measurable Goal	Permit Reference Expected Implementation		Expected Implementation
Methodology will consist of collecting a minimum of four (4)		Part III.A.1.a	Year 1
grab samples.			
ВМР	Description		
9.12 – Submit a detailed description of	The monitoring scheme will include: a list of pollutants; a description		
the monitoring scheme to EPA and NMED	of monitoring sites with an explanation of why those sites were		
	selected		
for approval.	selected		
for approval.  Measurable Goal	selected	Permit Reference	Expected Implementation
		Permit Reference Part III.A.1.c —	Expected Implementation Year 1

BMP	Description		
9.13 – Submit certification that all wet	Conduct wet weather monitoring to gather information on the		
weather monitoring sites are operational	response of receiving waters to wet weather discharges from the		
and begin sampling	MS4		
Measurable Goal		Permit Reference	Expected Implementation
Methodology will consist of collecting a minimum of four (4)		Part III.A.1.h	Year 1
grab samples.			

#### 14.1.2 Dry Weather Monitoring

EXPO New Mexico will identify, investigate, and address areas within its jurisdiction that may be contributing excessive levels of pollutants to the sMS4 as a result of dry weather discharges.

ВМР	Description		
9.21 – Perform wet weather monitoring	Conduct wet weather monitoring to gather information on the		
	response of receiving waters to wet weather discharges from the MS4		
Measurable Goal	10134	Permit Reference	Expected Implementation
Methodology will consist of collecting a minimum of four (4)		Part III.A.2	Year 1
grab samples.			

#### 14.1.3 Floatable Monitoring

EXPO New Mexico is a non-traditional MS4 as defined in Part VII and will sample/assess at one (1) station as shown on the Facility Map in Appendix B (ref. Part III.A.3).

#### 14.2 ANNUAL REPORT

MS4 General Permit requires EXPO New Mexico to submit an annual report to the EPA. The report will cover all SWMP activities for the prior permit year of January 1<sup>st</sup> - December 31<sup>st</sup>. EXPO New Mexico is also required to provide public notice and make available for public comment a draft of the Annual Report for at least thirty (30) days. All public input and any resulting changes to the SWMP must be addressed in the annual report before it is submitted to the EPA. Refer to Part 5.8 of the MS4 General Permit for a discussion of items that must be included in the annual report. These items include, but are not limited to:

#### 14.2.1 SWMP Status of Implementation

- A statement of EXPO New Mexico's status of compliance with the MS4 General Permit;
- An assessment d the appropriateness of the BMPs that have been implemented;
- Review of the progress made toward reducing the discharge of pollutants to the Maximum Extent Practicable (MEP);
- An assessment of the success of the measurable goals for each of the MCMs;
- A summary of the storm water activities that EXPO New Mexico is going to implement during the next reporting cycle, including a schedule;

#### 14.2.2 SWMP Revisions

- Proposed changes to the SWMP, BMPs or measurable goals;
- Description and schedule of any additional BMPs that may be necessary based on new information or applicable TMDLs;

 A notice of any agreements that EXPO New Mexico has for another government entity to satisfy related permit obligations;

#### 14.2.3 Performance Assessment

 A summary of the collected and analyzed information, if any, used to track the success of the program;

#### 14.2.4 Annual Expenditures

- Description and schedule of Annual Expenditures on Control Measures;
- Description and schedule of Annual Expenditures on compliance costs.

#### 14.2.5 Public Review and Comment

- A summary of any issues raised by the public on the Draft Annual Report;
- Proposed changes to the SWMP based on public comment; and
- A summary of EXPO New Mexico's response to public comments.

#### 15.0 SCHEDULE AND MEASUREABLE GOALS

The MS4 General Permit is effective for five years, starting on December 22, 2014 and expiring on December 22, 2019. The BMP's presented herein will be implemented within the first annual reporting period unless noted in the BMP.

#### 16.0 REFERENCES

Federal Register (1999), *National Pollutant Discharge Elimination System-Regulations for Revision of the Water Pollution Control Program Addressing Storm Water Discharge*, Vol. 64, No. 235. December 8, 1999.

Federal Register (2007), Final NPDES General Permits for Small Municipal Separate Storm Sewer Systems (shUS4s) in New Mexico, Indian Country Lands in New Mexico and Indian Country Lands in Oklahoma; Minor Revisions and Conditions, Vol. 72, No. 113. June 13, 2007.

National Park Service (2014), National Register of Historical Places, Reviewed February, 2014.

U.S. Fish & Wildlife Service, Southwestern Region Ecological Services (2014).

## APPENDIX A - Summary of Issues Raised in Any Local Public Comments Received by the MS4 Operator on the Draft NOI/SWMP Information and MS4 Operator's Responses

Any issues/comments raised during the public review of this NOI will be summarized here and addressed by EXPO New Mexico (Small MS4 Operator) following the public review period and prior to submitting the final NOI to the EPA Region VI.

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#### **Affidavits**

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EXPO New Mexico has submitted a Notice of Intent (NOI) and Storm Water Management Program (SWMP) to the Environmental Protection Agency (EPA) for coverage under NPDES General Permit for the Middle Rio Grande Watershed Based Municipal Separate Storm Sewer.

Permit Number NMR04A000. A. NOI and SWMP has been prepared by EXPO New Mexico to cover the unincorporated Albuquerque Urbanized Areas known as the State Fairgrounds. The SWMP is intended to reduce the discharge of pollutants and protect storm water quality.

Copies of the Draft Notice of Intent and SWMP are available for public review at the Administrative Office Front Counter (505-222-9700) at 300 San Pedro Blvd NE, Albuquerque, NM 87108.

Any person may submit written comments pertaining to the NOI and SWMP within 60 days of the publishing of this notice. Comments should be directed to Mr. John Jaramillo, SWMP Deputy Director at P.O. Box 8456, Albuquerque, NM 87198. Comments relating to the accuracy, completeness, and appropriateness of the SWMP may result in changes to the SWMP.

Journal: March 15, 22, 2015

Middle Rio Grande Watershed Based MS4 Permit NPDES Permit No. NMR04A000 – NOI Review

Facility: EXPO New Mexico

April 20, 2015

#### **Comments - NOI:**

#### **Section II Eligibility Determination**

1. Section II.A. Receiving Waters Information: Please mark the box "YES" as EXPO has calculated a sub-measurable goal for the bacteria TMDL, see Appendix B of the Permit and Section 6 of the EXPO Stormwater Management Plan.

Response: Correction was made.

2. Section II.C: Eligibility criteria to meet Endangered Species Act (ESA) was determined during the ESA consultation with the Fish and Wildlife Service Office (see August 21 2014 Biological Opinion). Please delete all information related to ESA in Section II.C of the NOI. Include all deleted information from Section II.C related to ESA in the SWMP. Please note EXPO New Mexico must comply with the ESA requirements included in Part I.C.3.a.(i) Dissolved Oxygen Strategy in the Receiving Waters of the Rio Grande, and Part I.C.3.b. Sediment Pollutant Load Reduction Strategy.

Response: The modification of the NOI and SWMP was made to include ESA information in the SWMP.

#### <u>Section III Preliminary Description of the Proposed Stormwater Program</u>

3. Section 2.5: The education program in Section 2.5 should include education programs to educate stormwater practitioners on the design, implementation, and maintenance of Green Infrastructure (GI)/Low Impact Development (LID) practices.

Response: The implementation of an educational program for storm water practitioners has been included in the NOI.

4. Section 3.2: It is unclear if EXPO will include the program elements described in Part I.D.5.c.(ii). e.g., develop an operational manual for de-icing activities, modify existing street sweeping program, procedures to target roadway areas most likely to contribute pollutants, etc. Section should include specific BMPs to address program elements in Part I.D.5.c.(ii).

Response: Many of the required program elements are not relevant to the operations of the EXPO New Mexico non-traditional sMS4. However, the SWMP has included implementation of programs to address the required program elements.

#### <u>Comments – Stormwater Management Plan (SWMP)</u>

5. Proposed BMP Sections 11.1 thru 11.8: it is unclear if the proposed SWMP will address all permit requirements in Part I.D.5. EXPO should cross reference the permit requirement in each proposed control (BMP). See example below.

Response: Cross references to permit requirements have been included in the SWMP and BMP's

In addition, some of the proposed implementation schedules in the SWMP (Tables included in Section 11.1 thru 11.8 of the SWMP) do not meet the compliance schedules specified in the permit (see tables 2 thru 9 in Part I.D.5 of the permit).

Response: The implementation schedules have been revised in accordance with Notice of Minor Permit Medications dated April 9, 2015.

6. 6.21: If the intent the standard in 6.21 is to address Part I.D.5. b (establish post construction controls that would prevent or minimize water quality impacts, for projects disturbing greater than or equal to one acre, the 80th percentile storm event discharge volume associated with redevelopment sites should apply on redevelopment sites.

For clarity, EXPO should change the phase *Construction Standard* to *Post-construction Standard*.

Response: The clarification has been made.

7. What is the intent of 6.23? to address Part I.D.5.b.(ii).(b)? if so, the Drainage Design Guidelines should be implemented 2.5 years from permit effective date, no 3-5 years. Cross reference with permit requirements are needed in all proposed BMPs of the SWMP.

Response: The implementation schedules have been revised in accordance with Notice of Minor Permit Medications dated April 9, 2015.

8. Pollution Prevention Good Housekeeping for Permittee Operations: BMPs to address program elements in Part I.D.5.c.(ii).a thru Part I.D.5.c.(ii).n were not included in Section 11.3 of the SWMP. If those program elements will be included in 6.32, Section 11.3 should be revised to cross reference permit requirements. Implementation schedule should be one (1) year from effective date of the permit, not 2 years as proposed.

Response: The implementation schedules have been revised in accordance with Notice of Minor Permit Medications dated April 9, 2015.

9. Training in 6.33: if the proposed training in 6.33 addresses the training required in Part I.D.5.c.(i).a, (Development and implementation of an employee training program to incorporate pollution prevention and good housekeeping techniques into everyday operations and maintenance activities), the implementation schedule should start 12 months from permit effective date, not 3-5 years.

Response: The implementation schedules have been revised in accordance with Notice of Minor Permit Medications dated April 9, 2015.

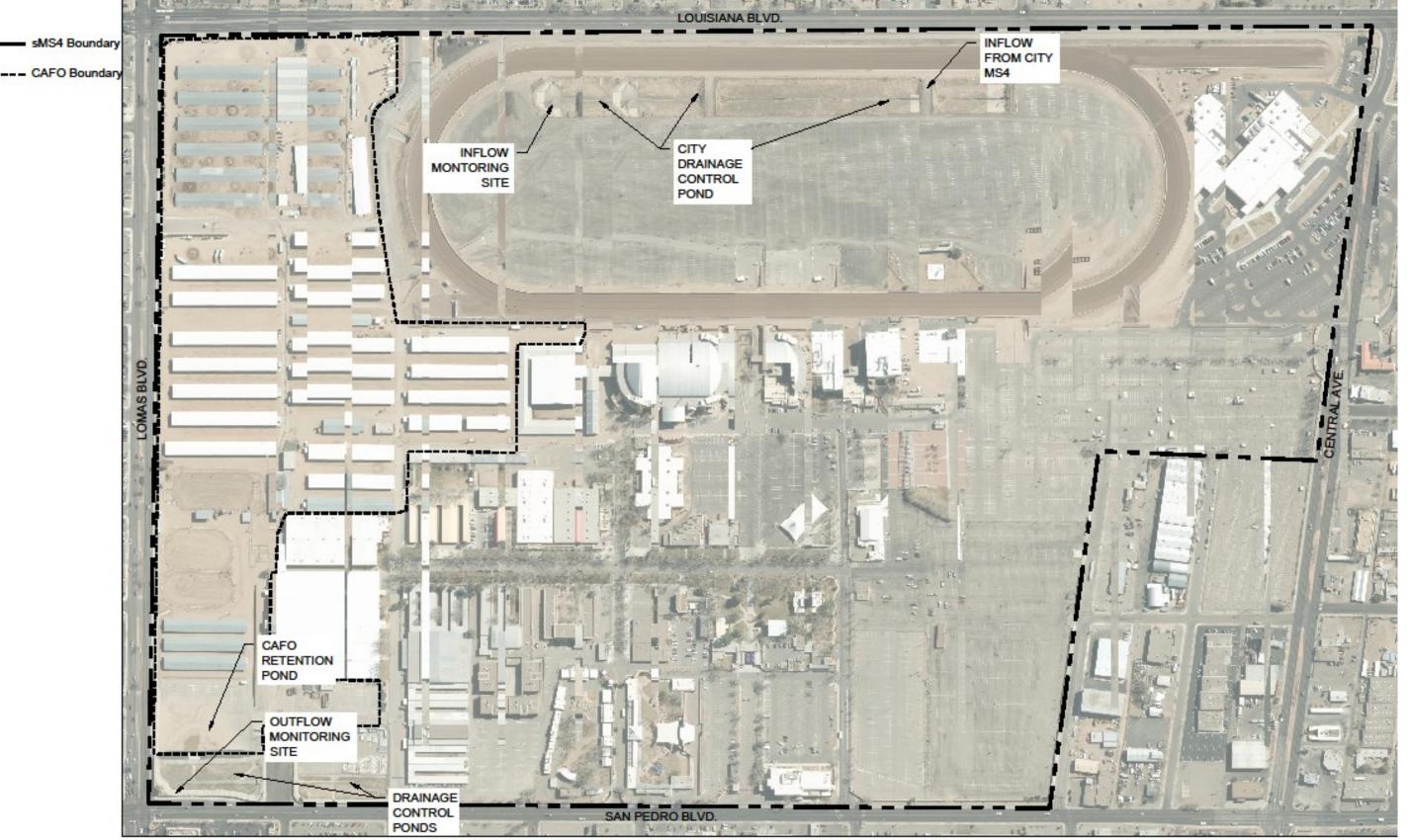
10. Mapping 6.51. Storm sewer and drainage system maps should be developed within 10 months of permit effective date. See Part I.D.5.e.(i)(a).

Response: The implementation schedules have been revised in accordance with Notice of Minor Permit Medications dated April 9, 2015.

11. Control of floatables, BMP 6.61: EXPO should develop a schedule to implement the program within ten months from the effective date of the permit as required in Part I.D.5.f.(i)(a). The effective date of the permit is December 22, 2014.

Response: The implementation schedules have been revised in accordance with Notice of Minor Permit Medications dated April 9, 2015.

### **APPENDIX B**



EXPO New Mexico - New Mexico State Fair Grounds

Figure 2 - Facility Map

#### **APPENDIX C - NHPA Documentation**

Dear Mr. Jaramillo,

I have looked through our files and it appears that there are 8 buildings that have been determined eligible for listing in the National Register of Historic Places. Two other buildings are of "interest" and probably should be considered of undetermined eligibility until further evaluated. The Agriculture Building, as Ed Boles, mentioned, is listed on the State Register of Cultural Properties as SR 1492. This building should be considered eligible for listing in the National Register as well. In a few moments, I will forward you a link to our FTP site where you can download the building forms, a letter regarding the eligibility of the Leon H. Harms Youth Hall and the State Register Nomination for SR 1492. Please do not hesitate to contact me if you have any questions or need additional assistance.

Sincerely,

Michelle M. Ensey Archaeologist NM Historic Preservation Division 407 Galisteo Street, Suite 236 Santa Fe, NM 87501 Telephone: (505) 827-4064

Fax: (505) 827-6338

www.nmhistoricpreservation.org

NEW MEXICO HISTORIC BUILDING INVENTORY FORM - STATE OWNED BUILDINGS survey date3/8/93 survey by Susan Lopez survey ID no. county 001 - Bernalillo building ID number NMSF Bldg. #105 building threatened? NM001 7.5 min. guad, map no. UTM reference northing easting 35106-A5 Zone 12 13 location description olty/town Albuquerque New Mexico State Fairgrounds Albuquerque, New Mexico NM State Fair agency Fairground Location: contact Mr. Mike McCollum 265-1791 Corner of Main Street & Racetrack Ave. legal description building name Fine Arts Gallery n srange. film role negative nos. loc. of neg. plan shape S.L. 2(8.1)HPB Santa Fe no. Main Street date of construction estimate 1940 actual source NM State Fair Records residential present other Fine Arts Gallery use residential historic other Fine Arts Gallery US6 condition excellent \_X\_ good style foundation material fair deteriorating Concrete degree of remodeling Pueblo Revival wail material/surface X\_ minor \_\_\_\_ moderate \_\_\_ Adobe / Stucco describe: in-filled original window openings on west wall. architectural features Elat parapet (raised at entry & central portion of building). surroundings 4/4 wood sash windows w/ wooden lintel, tandem on east, triple on north & south; Exhibition structures original window openings on west filled in, but still reflect fenestration pattern: 2-lite relationship to surroundings fixed windows flank entry - Double door at entry (wood) w/ 4-lite transom — similar — - not similar - Portal has exposed vigas, corbels (see back of form) on round wood posts district potential . Metal-lined wood canales on north, south & west - Ves Wooden vigas visible on north, south & east significance - More recent approx. 30\* brick base on north, south & east (Jan. 1983) X\_eligible \_\_\_ of Interest\_\_ none comments If eligible, Building is intact, with only some This building is a WPA project. tampering w/ window openings. Is an why? excellent example of bldg, style, associated buildings? what type? Exhibition/Administration if inventoried, list ID nos. Agriculture Bldg - HPD ID No. 1492 historic context Architecture and Social History (WPA era bldg.) see back? \_\_X\_\_ ves.

NEW MEXICO HISTORIC BUILDING INVENTORY FORM - STATE OWNED BUILDINGS survey date3/8/93 survey by Susan Lopez survey ID no county 001 - Bernalillo bullding ID number building threatened? NMSF Bldg. #404 - A, B, C NM002 No. 7.5 min. quad. map no. northing UTM\_reference easting 35106-A5 Zone 12 13 location description city/town Albuquerque New Merrico State Fairgrounds NM State Fair Albuquerque, New Mexico agency Fairground Location: contact Mr. Mike McCollum 265-1791 SW Corner of 7th & Main Street. legal description building name Beef Cattle Barn(s) tnsp \_\_\_ \_n srange\_ e w sec\_\_\_ plan shape negative nos. loc, of neg. film role HPB Santa Fe 4, 6 (& 3,5) SL bγ no. (See Back) date of construction - estimate <u>1938/39</u> actual source NM State Fair Records present residential other Beef Cattle Bams. use residential historic other Beef Cattle Barns. condition excellent \_ good deteriorating foundation material X\_\_fair style Concrete degree of remodeling Pueblo Revival \_ major wall material/surface minor \_X\_ moderate . Adobe/Stucco (wood frame interior) describe: (See Associated Building Notes on back of form) architectural features surroundings Flat parapet steps up at "stall sections" (see back). Exhibition Structures Deeply recessed openings at rear of stalls w/ single wood shutter. Window openings on east have decorative wood grilles (12 lite windows). relationship to surroundings - Portal surrounding interior Courtyard has corbels (see back) on round wd. posts. similar --— not similar Buttressing on east and north (possibly west). district potential significance \_ of interest\_\_\_ none X eligible \_\_ if eligible, excellent example of architectural Associated Buildings: Addition (on west side) is a substantial size; all window style, and unique building use. Also, why? openings on this wall remain intact except for two which have been filled (flush with example of WPA project. the wall surface); small storage (?) building on NE corner; concession stand on east associated buildings? \_\_X\_\_ side is attached to the Cattle Barn - should be able to remove without harm to the. what type? Misc. (See comments) - Also Horse structure. if inventoried, list ID nos. This Survey ID # NM003 see back? yes historic context Architecture and Social History (WPA era bidg.)

NEW MEXICO HISTORIC BUILDING INVENTORY FORM - STATE OWNED BUILDINGS county 001 - Bernalilo building ID number NMSF Bidg. #502 survey ID no: building threatened? survey date3/8/93 NM003 survey by Susan Lopez 7.5 min. quad. map no. northing **UTM** reference easting 35106-A5 Zone 12 13 location description city/town Albuquerque New Mexico State Fairgrounds Albuquerque, New Mexico NM State Fair agency Eairground Location: contact Mr. Mike McCollum 265-1791 SE Corner of 7th & Main Street. legal description building name Horse Bams n s range\_ thsp. 0 W 50C\_\_\_\_ film role negative nos. plan shape loc. of neg. by SL 1 7,10 (8.8,9) **HPB** Santa Fe no. (See Back) date of construction estimate 1938 actual source NM State Fair Records present residential uso other Horse Barns residential historic other Horse Barns. use condition excellent X good style foundation material deteriorating fair Concrete degree of remodeling Pueblo Revival wall material/surface \_X\_ minor \_\_\_\_ moderate \_\_\_ major Adobe/Stucco (wood frame interior) describe: Appears to be original w/ exception of maintenance and upkeep work architectural features surroundings Flat paraget steps up at "stall sections" (see back). Exhibition Structures Desply recessed openings at rear of stalls and along east side w/ single wood. shutter relationship to surroundings Window openings on west have decorative wood grilles X not similar not similar - Portal surrounding interior Courtyard has corbels (see back) on round wd. posts district potential Buttressing on north, west and east — ves \_X\_\_ no significance \_X eligible \_\_\_ of interest\_\_ none comments If eligible, excellent example of architectural This building is a WPA project. style, and unique building use. Also, whv? example of WPA project. associated buildings? \_\_X\_\_\_yes what type? Cattle Barns if inventoried, list ID nos. This Survey ID # NM002 see back? historic context Architecture and Social History (WPA era bidg.) yes

NEW MEXICO HISTORIC BUILDING INVENTORY FORM - STATE OWNED BUILDINGS survey ID no. survey date3/8/93 survey by Susan Lopez building ID number NMSF Bldg, #703 building threatened? county 001 - Bernalillo NM005 7.5 mln. quad. map no. UTM\_reference easting northing 35106-A5 Zone 12 13 location description city/town Albuquerque New Mexico State Fairgrounds Albuquerque, New Mexico agency NM State Fair Fairground Location: contact Mr. Mike McCollum 265-1791 North of Tingley Colosseum legal description building name Race Horse Barn (703) tnsp \_\_\_\_\_n srange\_ film role negative nos. loc, of neg. plan shape by SL 1 15 (& 16) / 18 detail **HPB** Santa Fe no. PORTAL PORTAL date of construction estimate 1938 actual source NM State Fair Records present residential other Horse Barn U.S.O. residential historic other Horse Barn. use The second second second condition \_excellent \_\_\_\_ good foundation material X\_\_falr\_ deteriorating Concrete: degree of remodeling Southwest Vernacular wall material/surface \_X\_ minor \_\_\_\_ moderate \_\_\_\_ major Adobe/Stucco describe: architectural features surroundings Flat parapet concealing low gable roof which drains onto portal. Horse Barns Deeply recessed window and door openings, wood trim pediments over doors. - Portal has corbels (see back) on square posts w/ concrete base relationship to surroundings X similar not similar district potential \_\_\_\_ yes \_X\_\_ no significance \_X\_eligible \_\_\_\_ of interest\_\_\_ none If eligible. Good example of architectural style. This building is a WPA project. and unique building use. Also, example of WPA project. associated buildings? yes what type? Horse Barns if inventoried, list ID nos. This inventory ID # NM004 & NM006 see back? historic context Architecture and Social History (WPA era bidg.) \_X\_ yes

NEW MEXICO HISTORIC BUILDING INVENTORY FORM - STATE OWNED BUILDINGS survey ID no. building ID number NMSF Bldg. # 707 survey date3/8/93 survey by Susan Lopez county 001 - Bernalillo building threatened? NM006 No. 7.5 min. quad. map no. northing UTM\_reference easting 35106-A5 Zone 12 13 location description city/town Albuquerque New Mexico State Fairgrounds. Albuquerque, New Mexico. NM State Fair agency Eatroround Location: contact Mr. Mike McCollum 265-1791 North of Tingley Colosseum. legal description building name Race Horse Barn (707) e w sec. tnsp\_ n srange sha 20 film role negative nos. loc. of neg. by SL **HPB** Santa Fe 13 (& 14) no. ÷ PORTAL date of construction estimate 1939 \_\_ actual source NM State Fair Records residential present other Horse Barn. use. residential historic other Horse Barn use condition excellent \_ good foundation material deteriorating Concrete degree of remodeling Southwest Vernacular wall material/surface X minor \_\_\_\_ moderate \_\_\_ major Adobe/Stucco describe: architectural features surroundings Flat parapet concealing low gable roof which drains onto portal. Horse Barns Deeply recessed window and door openings, wood trim pediments over doors. Portal has corbels (see back) on square posts w/ concrete base. relationship to surroundings X..... similar ..... not similar district potential \_X\_ no significance \_X\_eligible \_\_\_\_ of interest\_\_\_ none if eligible, Good example of architectural style, comments This building is a WPA project. and unique building use. Also, why? example of WPA project. associated buildings? Ves what type? Horse Barns if inventoried, list ID nos. This inventory ID # NM004 & NM005

historic context Architecture and Social History (WPA era bidg.)

yes

see back?

NEW MEXICO HISTORIC BUILDING INVENTORY FORM - STATE OWNED BUILDINGS building threatened? survey date3/8/93 survey by Susan Lopez county 001 - Bemaillo building ID number NMSF Bldg. # 102 A & B survey ID no. NM007 7.5 mln. quad. map no. UTM\_reference easting northing 35106-A5 Zone 12 13 iocation description city/town Albuquerque New Mexico State Fairgrounds Albuquerque, New Mexico... NM State Fair agency Eairground Location: contact Mr. Mike McCollum 265-1791 Entrance (Public) Off of San Pedro Ave. iegai description building name Gate #4 - Entrance (Two ident. Struct.) tnsp\_ \_n srange\_ film role negative nos. loc. of neg. plan shape HPB Santa Fe by SL 12 no. wrought item. hafd PEDROI AVE date of construction - estimate 1942 actual source NM State Fair Records residentiai present use. other Gate House residential historic other Gate House use condition \_\_\_\_ excellent \_\_X\_ good style foundation material deteriorating Concrete degree of remodeling Pueblo Revival wall material/surface X minor moderate major Adobe/Stucco describe: Original arch removed - otherwise only maintenance repairs architectural features Undutating parapet. surroundings - Deeply recessed 12 - It wide casement windows with wide lintel Parking Lots Single wide door has 1 - lit relationship to surroundings Wide vigas above doorway X similar — - not similar district potential significance \_X\_eligible \_\_\_\_ of Interest\_\_\_ none comments If eligible, Excelent example of architectural The two structures are mirror images of each other at this entrance: original erch style, in very good condition. Also, why? removed... WPA project. associated buildings? what type? if inventoried, list ID nos. N.A.

historic context Architecture and Social History (WPA era bidg.)

yes.

see back?

NEW MEXICO HISTORIC BUILDING INVENTORY FORM - STATE OWNED BUILDINGS survey ID no. building ID number county 001 - Bernalillo survey date3/8/93 survey by Susan Lopez building threatened? NIM009 NMSF Bidg. # 307A No 7.5 min. quad. map no. northing UTM\_reference. easting 35106-A5 Zone 12 13 location description alty/town Albuquerque New Mexico State Fairgrounds Albuquerque, New Mexico... NM State Fair agency Fairground Location: contact Mr. Mike McCollum 265-1751 To north of Racetrack Grandstand legal description building name Jockey Rooms e w sec\_ \_n srange. plan negative nos. loc, of neg. shape film role ш HPB Santa Fe by SL no. date of construction estimate 1939 actual source NM State Fair Records present residential шае other office/lockey rooms. residential historic other jackey rooms. 田名会 condition excellent good style foundation material fair. deteriorating Concrete degree of remodeling Puebio Revival wall material/surface minor \_\_\_\_ moderate \_X\_ major Adobe/Stucco describe: Additions to Rear and side, also major renovations to interior architectural features Flat parapet steps at additions; original portion: 6/6 double hung windows with surroundings coliseum and grandstands exposed wood lintels (recessed); double doorway has wide lintel; portal has round wood posts (with zapatas) supporting exposed wood beam. relationship to surroundings X similar — not similar district potential significance \_\_\_eligible \_X of interest\_\_ none

commente

historia context

Yes

yes

if eligible, Site history

associated buildings?

If inventoried, list ID nos.

why?

what type?

see back?

NEW MEXICO HISTORIC BUILDING INVENTORY FORM - STATE OWNED BUILDINGS survey ID no. building ID number NMSF Bldg. # 306 county 001 - Bernalillo survey date3/8/93 building threatened? NM010 survey by Susan Lopez No. 7.5 min. guad, map no. northing **UTM** reference easting 35106-A5 Zone 12 13 location description city/town Albuquerque New Mexico State Fairgrounds. Albuquerque, New Mexico. NM State Fair agency Fairground Location: contact Mr. Mike McCollum 265-1791 To south and west of grandstand legal description building name South Entrance Gate and Restrooms tnap \_\_\_\_ \_n srange\_\_\_\_ e w sec\_\_\_ film role negative nos. loc. of neg. plan shape by SL - 1 20 and 19 HPB Santa Fe no. See Back date of construction estimate 1940 actual source NM State Fair Records residential present other Restrooms/Gate/Offices use. residential historic other Restrooms/Gate/Offices use condition excellent \_\_\_\_ good style foundation material X\_\_foir deteriorating Concepte degree of remodeling Pueblo Revival wall material/surface \_\_X\_\_minor \_\_\_\_\_ moderate \_\_\_\_ major Adobe/Stucco describe: South entrance gate has undergone several minor face-lifts architectural features surroundings Flat parapet with canales - north section of east building has projecting vigas: 1/1. Coliseum double hung wood windows (singls) with continuous concrete sill, metal grills on windows of east building: North section of east building: 1-lite windows with relationship to surroundings exposed wild lintels. Portals have round wood columns supporting corbels and X not similar not similar exposed wood beam. district potential — yes —X no significance \_\_eilgible \_X\_ of interest\_\_\_ none If eligible, if we can determine how close to Original conversations with NMSF staff indicated that this building was no longer original this is, it may be eligible why? standing. On-site visit procyed it is still there, and in fairly good condition. Fair attendees approaching from Central Avenue or from the south parking lots must all associated buildings? \_X\_\_\_ enter through this gate. Additionally, in recent years SunTran bus shuttles arrive what type? Jockey rooms and depart outside this gate. If inventoried, list ID nos. This inventory ID # NM009 see back? X historic context \_ yes